UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	**MDL No. 2875**
THIS DOCUMENT RELATES TO ALL CASES	**HON. ROBERT B. KUGLER**

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Alexia Brancato, Esq.**
Brittney Nagle, Esq.
Kirkland & Ellis LLP
601 Lexington Avenue
New York, NY 10022

Attorneys for Defendants

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition via Zoom, of Mark Robbins, PH.D, J.D., on March 8, 2022, at 9:00 a.m. central time, and continuing until completion, at Strategic Consultants, LLC, located at 2140 Harbor Lane North, Ste. 130, Plymouth, Minnesota 55447, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least two (2) days in advance of the deposition, to the extent not already served upon Plaintiffs.

TAKING ATTORNEY FOR PLAINTIFFS:

Daniel Nigh or Madeline Pendley
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The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

Dated this 23rd day of February 2022

PLAINTIFFS' COUNSEL

By: /s/ Stacy A. Burrows
Stacy A. Burrows
Barton and Burrows, LLC
5201 Johnson Drive, Ste. 110
Mission, KS 66205

EXHIBIT A

DOCUMENT REQUESTS

1. Copies of all invoices for work performed in connection with any consultation or expert work performed for or on behalf of any Defendant or their counsel with regard to any issues in this Multi-District Ligation, including but not limited to for the review of documents, review and consultation with regard to plaintiff experts, preparation of the expert's report, and preparation for deposition or trial.

2. Any notes, i.e. written or electronic, reflecting consulting or litigation work that has not been documented in invoices.

3. All documents relating to any remuneration you have received in the last ten (10) years from any manufacturer, distributor, or retailer of pharmaceutical drugs.

4. Any articles, presentations, seminars, classes, or other similar documents (including PowerPoint-type slides) authored or used by the expert with regard to USP monographs, the Orange Book, RLDs, NDAs, aNDAs, DMF, hypertension, treatments for hypertension, ARBs, adulteration, misbranding of drug products.

5. Any articles, presentations, seminars, classes, blogs, posts, or other similar documents (including PowerPoint-type slides) authored by the witness and any aspect of concerning pharmacy benefits and reimbursement, FDA regulatory compliance for pharmaceutical drugs, or related in any to the witness's opinions in this matter.

6. Copies of any documents or articles relied upon for the opinions set forth in the witness' expert report served, if not listed in the expert report.

7. Copies of any documents or articles reviewed in connection with the witness' expert report served, whether or not listed in the expert report or attachments thereto.

8. Copies of all Publications and Presentations listed in the witness's CV attached as Appendix A to his expert report, and any updated CV and prior testimony list.

9. Copies of the "Quality Management Systems" the witness was responsible for developing to assure compliance with the CMGPs and Good Clinical Practice regulations and regulatory requirements as descried in the witness' expert report at pages 2-3.

10. Copies of the 20 FDA foreign regulatory inspections the witness states that he personally conducted and was primarily responsible for responding to compliance issues identified, including the FDA Form 483s, Establishment Inspection Reports, Warning Letters and product recalls that were received when the witness was the responsible person.

11. Copies of the training materials the witness used when training others on pharmaceutical industry practices and inspections as described in his expert report.

12. Any illustrations, PowerPoints, images, charts, tables or demonstrative exhibits that may be used by or with the witness in connection with a Daubert hearing or trial testimony in this litigation.

13. Documentation of any prior work the witness has done as a consultant for any of the Defendants in this Multi-District Ligation.

14. All documents reflecting valsartan or any other drug recalls relating to nitrosamines that the witness received, reviewed, or sent.

15. Any documents or other communications the witness has received from any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of information provided by counsel who retained the witness.

16. Any communications from the witness to any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of communications to counsel who retained the witness.

17. Any textbook referenced by the witness in forming his opinions.

18. All documents relating to any FDA Regulations you consulted, including identity of entities and persons with whom you consulted.

19. Copies of all transcripts of testimony under oath given by the witness in the last ten (10) years.

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2022, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this Multi-District Ligation.

PLAINTIFFS' COUNSEL

By: /s/ Stacy A. Burrows

Stacy A. Burrows
Barton and Burrows, LLC
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